

From: lgwin@nature.berkeley.edu
Sent: Saturday, June 03, 2006 8:21 PM
To: NOP Livestock
Subject: docket TM-05-14

Attachments: ATTACHMENT.TXT
Mr. Bradley,

Thank you for the opportunity to comment on the NOP organic pasture rule.

I am a researcher, currently with University of California Cooperative Extension, working with our region's livestock producers interested accessing in non-commodity markets. I am also a member of the Marin-Sonoma Livestock Working Group, a collaborative of innovative ranchers, county and municipal agencies, and non-governmental organizations. I offer you this info as my credentials. However, the current comments on docket TM-05-014 are my own, drawn from my research and work experience, but also based on my role as a consumer.

It is my opinion that organic animals must be PASTURED animals. Two important points about pasturing:

- ruminant livestock must graze pasture for the growing season, at least 120 days per year. This is possible even in harsh climates, and only producers who can achieve this high standard should be rewarded with the organic label!
- the grazed pasture must provide a significant portion of total feed requirements - and no less than 30% of dry matter intake during the growing season

I also agree with recommendations that the organic regulations be rewritten to reflect tougher pasture standards:

§ 205.237 Livestock feed.

(b) The producer of an organic operation must not:

(7) Prevent dairy animals from grazing pasture during lactation, except as allowed under §205.239(b).

(c) Ruminant livestock must graze pasture for the growing season but not less than 120 days per year. The grazed pasture must provide a significant portion of the total feed requirements but not less than 30% of the dry matter intake on an average daily basis during the growing season.

§ 205.239 Livestock living conditions.

(a) The producer of an organic livestock operation must establish and maintain livestock living conditions which accommodate the health and natural behavior of animals, including:

(1) Access to the outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight suitable to the species, its stage of production life, the climate, and the environment;

(2) Access to pasture for ruminants, as required in 205.237(c).

(b) The producer of an organic livestock operation may provide temporary confinement for an animal because of:

(2) The animal's stage of production life; for ruminants this includes only:

(i) birthing;

(ii) dairy animals up to 6 months of age; or

(iii) beef animals during a final finishing stage not to exceed 90 days

Thank you for accepting these comments. I hope you will make these changes to strengthen the NOP regulations regarding pasture and organic animals.

Sincerely,
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